

JORDAN ETH (CA SBN 121617)
JEth@mofo.com
ANNA ERICKSON WHITE (CA SBN 161385)
AWhite@mofo.com
MARK R.S. FOSTER (CA SBN 223682)
MFoster@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

Attorneys for Defendants
Yahoo! Inc., Carol A. Bartz, and Jerry Yang

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE YAHOO! INC. SECURITIES
LITIGATION

Master File: 3:11-cv-02732-CRB

[Consolidated with 3:11-cv-03870-CRB]

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER SETTING SCHEDULE**

[Civil L.R. 6-1(b)]

RECITALS

A. This securities class action, which was commenced on June 6, 2011, is governed by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 *et seq.* (the “Reform Act”).

B. On August 5, 2011, this Court entered an order on the parties’ stipulation providing that Defendants will meet and confer with the court-appointed lead counsel within fourteen days after the Court makes its appointment of lead plaintiff to discuss the schedule in this action, including the scheduling of the initial case management conference.

C. On October 12, 2011, this Court appointed Pension Trust Fund for Operating Engineers as lead plaintiff and approved Robbins Geller Rudman & Dowd LLP as lead counsel.

D. The parties, through counsel, have met and conferred regarding a proposed schedule for the filing of Plaintiffs’ Amended Consolidated Complaint and Defendants’ response. Given that this action is subject to the Reform Act’s automatic stay of discovery pending the Court’s ruling on Defendants’ anticipated motion to dismiss, the parties agree that it would be appropriate to defer the case management conference until after the Court rules upon Defendants’ anticipated motion to dismiss.

STIPULATION

NOW, THEREFORE, the parties stipulate pursuant to Civil Local Rule 6-1(b) and subject to Court approval, as follows:

1. Plaintiffs shall file their Amended Consolidated Complaint on Friday, December 16, 2011.

2. Defendants shall respond to the Amended Consolidated Complaint on Friday, January 27, 2012.

3. If Defendants file a motion to dismiss the Amended Consolidated Complaint, as presently anticipated, Plaintiffs shall file any Opposition papers on Friday, March 9, 2012.

4. Defendants shall file any Reply papers on Friday, April 13, 2012.

5. Defendants shall notice their motion for hearing on Friday May 4, 2012, at 10:00 a.m.

1
2 Dated: October 20, 2011

MORRISON & FOERSTER LLP

3 By: /s/ Mark R.S. Foster

4 Attorneys for Defendants Yahoo! Inc.,
Carol A. Bartz, and Jerry Yang

5
6 Dated: October 20, 2011

ROBBINS GELLER RUDMAN
& DOWD LLP

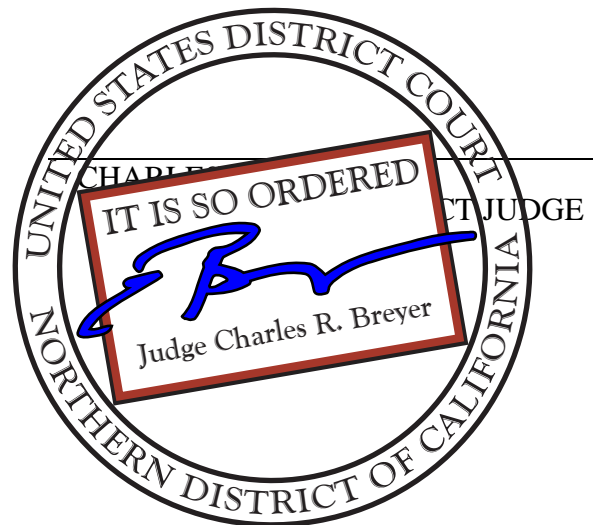
7 By: /s/ Christopher P. Seefer

8 Attorneys for Plaintiff Vince Bonato
9 and Proposed Lead Plaintiff the
10 Pension Trust Fund for Operating
Engineers

11
12 **ORDER**

13 PURSUANT TO STIPULATION, IT IS SO ORDERED.
14
15

16
17 Dated: October 24, 2011



ECF ATTESTATION

I, Mark Foster, am the ECF User whose ID and Password are being used to file this:

STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE

In compliance with General Order 45, X.B., I hereby attest that Christopher P. Seefer, has concurred in this filing.

Dated: October 20, 2011

MORRISON & FOERSTER LLP

By: /s/ Mark R.S. Foster